

Law Offices of
 VIJAYANT PAWAR, ESQ. (7642)
 35 Airport Road, Suite 330
 Morristown, New Jersey 07960
 Tel.: (973) 267-4800
 Fax: (973) 215-2882
 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

PURE TECH SYSTEMS, INC.

Plaintiff,

vs.

KEMPER ENVIRONMENTAL LTD, and
 KEMPER INDEMNITY INSURANCE
 COMPANY,

Defendants.

Hon. Richard M. Berman

Civil Action No. 07-7065 (RMB)(MHD)

SEP 12 2007
 U.S. DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK
**NOTICE OF MOTION FOR
 ADMISSION OF SEAN M. WALSH AND
 SAULIUS K. MIKALONIS
 PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Vijayant Pawar, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

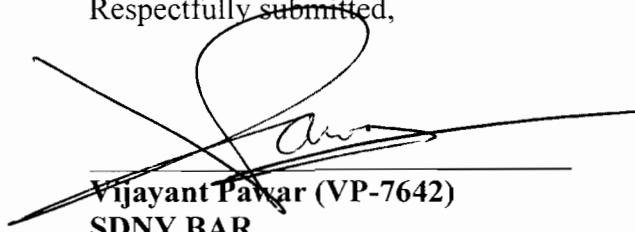
Applicant's Name: SEAN W. WALSH —
 Firm Name: GIARMARCO, MULLINS & HORTON, P.C.
 Address: 101 W. BIG BEAVER ROAD, 10TH FLOOR
 City/State/Zip: TROY, MI 48084-5280
 Phone Number: (248) 457-7000
 Fax Number: (248) 457-7001

Applicant's Name: SAULIUS K. MIKALONIS —
 Firm Name: GIARMARCO, MULLINS & HORTON, P.C.
 Address: 101 W. BIG BEAVER ROAD, 10TH FLOOR
 City/State/Zip: TROY, MI 48084-5280
 Phone Number: (248) 457-7000
 Fax Number: (248) 457-7001

SAULIUS K. MIKALONIS is a member in good standing of the Bar of Michigan and District of Columbia. SEAN W. WALSH is a member in good standing of the Bar of the State of Michigan. There are no pending disciplinary proceedings against SAULIUS K. MIKALONIS or SEAN W. WALSH in any State or Federal court.

Dated: September 10, 2007
Morristown, New Jersey

Respectfully submitted,


Vijayant Pawar (VP-7642)

SDNY BAR

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**CERTIFICATION OF COUNSEL OF
RECORD IN SUPPORT OF
APPLICATION FOR
ADMISSION OF SEAN M. WALSH AND
SAULIUS K. MIKALONIS
PRO HAC VICE**

VIJAYANT PAWAR, being duly sworn, hereby deposes and says as follows:

1. I am VIJAYANT PAWAR, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Sean M. Walsh and Saulius K. Mikalonis as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in September 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Sean M. Walsh and Saulius K. Mikalonis since June 2007.
4. Sean M. Walsh and Saulius K. Mikalonis are attorneys at Giarmarco, Mullins & Horton P.C., in Troy, Michigan.
5. I have found Sean M. Walsh and Saulius K. Mikalonis to be skilled attorneys and a persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Sean M. Walsh and Saulius K. Mikalonis, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Sean M. Walsh and Saulius K. Mikalonis, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Sean M. Walsh and Saulius K. Mikalonis, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: September 10, 2007

Respectfully submitted,


Vijayant Pawar (VP-7642)

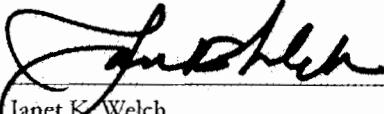
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State Bar of Michigan

Certificate of Good Standing



This certifies that Sean M. Walsh, P48724 of Troy, Michigan is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on November 8, 1993 in Jackson County and became a member of the State Bar of Michigan on November 10, 1993.


Janet K. Welch
Executive Director
August 14, 2007

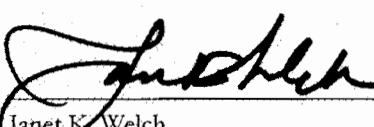


State Bar of Michigan

Certificate of Good Standing



This certifies that Saulius K. Mikalonis, P39486 of Troy, Michigan is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on November 21, 1986 in Washtenaw County and became a member of the State Bar of Michigan on November 21, 1986.


Janet K. Welch
Executive Director
August 14, 2007



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Defendants.

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Civil Action No. 07-7065 (RMB)(MHD)

**ORDER ALLOWING
ADMISSION OF SEAN M. WALSH AND
SAULIUS K. MIKALONIS
PRO HAC VICE**

Upon the motion of VIJAYANT PAWAR, attorney for PURE TECH SYSTEMS, INC. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	SEAN W. WALSH
Firm Name:	GIARMARCO, MULLINS & HORTON, P.C.
Address:	101 W. BIG BEAVER ROAD, 10 TH FLOOR
City/State/Zip:	TROY, MI 48084-5280
Phone Number:	(248) 457-7000
Fax Number:	(248) 457-7001

Applicant's Name:	SAULIUS K. MIKALONIS
Firm Name:	GIARMARCO, MULLINS & HORTON, P.C.
Address:	101 W. BIG BEAVER ROAD, 10 TH FLOOR
City/State/Zip:	TROY, MI 48084-5280
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ARE admitted to practice pro hac vice as counsel for PURE TECH SYSTEMS, INC. in the above captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

DATED:

United States District/Magistrate Judge

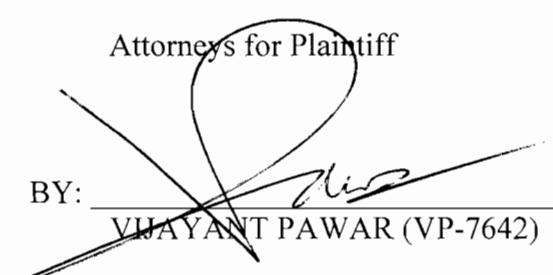
CERTIFICATION OF SERVICE

I, Vijayant Pawar, Esq, a member of the Bar of this Court, hereby certify that a copy of the within Motion was served this day by regular mail upon counsel for Defendant, David M. Pollack, Esq., Donovan Hatem LLP, One Penn Plaza, 250 W 34th Street, Suite 3324, New York, New York 10119

Law Offices of
VIJAYANT PAWAR

Attorneys for Plaintiff

BY:


VIJAYANT PAWAR (VP-7642)

DATED: September 10, 2007